

STATEMENT OF BASIS
MODIFICATION TO NPDES PERMIT NO. WA0040932

A footnote to the limits table on page 6 of 35 implies that the laboratory method of choice for copper is EPA 220.2 using the graphite furnace atomic absorption (GFAA) technique. A footnote to the limits table on page 7 of 35 implies that the laboratory method of choice for zinc is EPA 200.7 using the inductively coupled plasma (ICP) technique. North Creek Laboratories, Clark Public Utilities' laboratory of choice points out that EPA 220.2 is an obsolete technique. Ecology's Manchester Laboratory agrees. In addition, North Creek Laboratories states that EPA 200.8 (inductively coupled plasma with mass spectrum detector (IPC/MS) has a lower method detection limit than EPA 200.7. Clark Public Utilities requests that IPC/MS be allowed for copper and zinc detection. This change is made in the permit.